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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

JONATHAN HUNTE,
a/k/a "Dwight Campbell,"

Defendant.

CONSENT PRELIMINARY ORDER OF FORFEITURE/ MONEY JUDGMENT

15 Cr. 831 (AKH)

WHEREAS, on or about November 30, 2015, JONATHAN HUNTE, a/k/a "Dwight Campbell," (the "defendant"), was charged in a three-count Indictment, 15 Cr. 831 (AKH) (the "Indictment"), with mail fraud, in violation of 18 U.S.C. §§ 1341 and 2 (Count One); wire fraud, in violation of 18 U.S.C. §§ 1343 and 2 (Count Two); and aggravated identity theft, in violation of 18 U.S.C. §§ 1028A(a)(1), 1028A(b), and 2 (Count Three);

WHEREAS, the Indictment included a forfeiture allegation, with respect to Counts One and Two of the Indictment, seeking forfeiture to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One and Two of the Indictment;

WHEREAS, on or about June 3, 2016, the defendant pled guilty to Counts One and Two of the Indictment, pursuant to a plea agreement with the Government, wherein the defendant admitted the forfeiture allegation with respect to Counts One and Two of the Indictment and agreed to forfeit, a sum of money equal to $1,250,000 in United States currency, representing any property, real and personal, constituting and derived from proceeds traceable to the commission of the offenses charged in Counts One and Two of the Indictment; and

WHEREAS, the defendant consents to the entry of a money judgment in the amount of $1,250,000 in United States currency, representing the amount of proceeds traceable to the commission of the offenses charged in Counts One and Two of the Indictment;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorney Michael D. Neff, of counsel, and the defendant, and his attorneys, Jennifer E. Willis, Esq. and Christopher A. Flood, Esq., that:

1. As a result of the offenses charged in Counts One and Two of the Indictment, to which the defendant pled guilty, a money judgment in the amount of $1,250,000 in United States currency (the "Money Judgment") shall be entered against the defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the defendant, JONATHAN HUNTE, a/k/a "Dwight Campbell," and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance to the "United States Marshals Service," and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Asset Forfeiture Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

4. Upon execution of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to 21 U.S.C. § 853, the United States Marshals Service shall be authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary

Order of Forfeiture/Money Judgment, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate, or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents, and the issuance of subpoenas, pursuant to Rule 45 of the Federal Rules of Civil Procedure.

6. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2(e) of the Federal Rules of Criminal Procedure.

7. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture/Money Judgment to Assistant United States Attorney Jason Cowley, Chief of the Money Laundering and Asset Forfeiture Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York

By: _______________ 6/3/2016
MICHAEL D. NEFF DATE
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2107

JONATHAN HUNTE

By: _______________ 6/3/16
JONATHAN HUNTE DATE

By: _______________ 6/3/16
JENNIFER E. WILLIS, ESQ. DATE
CHRISTOPHER A. FLOOD, ESQ.
Attorneys for Defendant
Federal Defenders of New York, Inc.
52 Duane Street, 10th Floor
New York, NY 10007

SO ORDERED:

_______________ 6/3/16
THE HONORABLE ALVIN K. HELLERSTEIN DATE
UNITED STATES DISTRICT JUDGE